

EXHIBIT 72

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

JULIETA GARIBAY, *et al.*

vs.

DAVID WHITLEY, *et al.*

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Civil Action No. 2:19-cv-00040

DECLARATION OF DEBORAH M. LILES, PH.D.
IN SUPPORT OF APPLICATION FOR TEMPORARY RESTRAINING ORDER

STATE OF TEXAS
COUNTY OF PARKER

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1. My name is Deborah M. Liles, Ph.D. and I am a resident and registered voter of Parker County. I am over the age of 18 and fully competent to make this declaration. I have personal knowledge of each of the matters stated in this declaration.
2. I naturalized and became a U.S. citizen on March 24, 2015 at the offices of the U.S. Citizenship and Immigration Services (USCIS) in Irving Texas.
3. I registered to vote on the day I took the oath of citizenship. I have voted in all but one local election since, and was extremely pleased and proud to vote in the General Elections of 2016 and 2018.
4. I currently have a valid Texas driver's license. The Department of Public Safety issued my current driver's license to me on January 7, 2015. My license expires on December 4, 2020.
5. When I obtained my driver's license, I don't remember the identity document that I provided to the Texas Department of Public Safety (DPS). At the time, I was a lawful

permanent resident of the U.S. and I would have showed my permanent resident card to prove lawful presence.

6. About two weeks ago, I learned from the news that the Texas Secretary of State's Office had sent a list of suspected non-U.S. citizen voters to counties throughout Texas which included the names of naturalized U.S. citizens. I felt confident that my name was not on the list.
7. The week of February 4, 2019, I read an article about a naturalized citizen who was from the U.K. and whose name was on the Secretary of State's list. I thought about this woman and became concerned that I too might be on the list. On Thursday, February 7, 2019 I looked online for the phone number of the Parker County Elections Office and called that office.
8. I spoke to a man with the Parker County Elections Office and explained that I was calling because I am a naturalized citizen who was concerned that her name is on the Secretary of State's list of suspected non-U.S. citizen voters. I gave the man my name and he responded immediately that I was not on the list. I thought to myself, "Weatherford is a small town, maybe he knows me." I asked the man how he knew that my name was not on the list and he responded by saying "Because your name's not Hispanic" or words very close to that.
9. I asked the man to check the list of names from the Secretary of State. He was reluctant to check the list then agreed, saying "Let's just check it." I remained on the line waiting and then the man said, "Oh, there it is, your name is on the list." He seemed surprised. I asked him what I needed to do. The man told me that I didn't need to worry about it. He

did not ask me to provide any documents or more information other than my statement over the phone that I was a naturalized citizen.

10. He explained that he had been told to send notices to the voters on the list but that he wasn't doing that right now because they were working through the names. I asked the man how many voters were on the list. He responded that there were 108 but that enough people had been verified by the county that it stood at 69. I said that the list would now drop to 68 people that they are looking into and he agreed. He thanked me for calling in and letting him know that I was a citizen.

11. I thanked the man and hung up.

12. It bothers me tremendously that there is a list of suspected non-U.S. citizen voters who are naturalized citizens. I believe that if there was any question about the accuracy of the list, election officials should not have put anyone's voting rights at risk. Election officials are bestowed with power that should be used for the good of the citizens, not harm, and they should always conduct due diligence.

13. I am appalled that the Secretary of State's list was developed, much less released without confirming the status of those on it. I believe it is completely unethical to target people on the voter rolls because they are immigrants.

14. The day I naturalized I was overwhelmed with joy. Others who were also naturalized that day came from over 20 different countries and all expressed the same emotions. We were no longer outsiders, we were united. I obtained my green card in 1981 and it took me 33 years to get my U.S. citizenship. The naturalization process is long, costly, and time-consuming and took me two years to complete once I started it. The release of this

list targets immigrants who chose to become citizens, which I find abhorrent, as well as a violation of everything I thought came with immigration and subsequent citizenship.

15. I became a U.S. citizen so that I could vote. I realized I wanted to belong to this country and be a part of the political process. I am proud to vote in elections and be a part of the American political process, which stands as an example to many places in the world. It concerns me greatly that elected and appointed representatives in Texas are creating an environment that challenges the voting rights of any citizen. Targeting a specific group of citizens is against everything I understood this country represented.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed in Parker County, Texas on the __11__th day of February, 2019.



Deborah M. Liles, Ph.D.